

REMARKS

Claims 1-6, 16-18, 20-21, 25, 27, 34-36, 39, and 64-68 were presented for examination. The Examiner has rejected claims 1-6, 16, 21, 25, 27, 34-36, 39, and 64-68 under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent No. 6,081, 804 to Smith (hereafter “Smith”) in view of U.S. Patent No. 6,131,092 to Masand et al. (hereafter “Masand”). The Examiner has rejected claims 17-18 under 35 U.S.C. 103(a) as unpatentable over Smith in view of Masand and further in view of U.S. Pub. No. 2001/0044720 to Lee et al. (hereafter “Lee”). The Examiner has rejected claim 20 under U.S. C. 103(a) as unpatentable over Smith, in view of Masand, and further in view of U.S. Patent No. 6,523,022 to Hobbs (hereafter “Hobbs”). Claims 16-18, 21, 25, 27, 34, and 66 have been amended. No claims have been added or canceled. No new matter has been added. Claims 1 and 66 are independent.

Rejection of Claims Under 35 U.S.C. §103

Claims 1-3, 21, 25, 27, 34-36, 39, and 64-68 were rejected under 35 U.S.C. §103(a) as unpatentable over Smith in view of Masand. Independent claims 1 and 66 each recite, in relevant part, a query comprised of one or more fully specified terms and one or more at least partially unspecified terms.

Smith fails to teach or suggest a query comprised of one or more fully specified terms **and** one or more at least partially unspecified terms. The Examiner admits that Smith does not explicitly disclose one or more at least partially unspecified terms. *See* Office action, page 3. A partially unspecified term includes a restriction that defines a particular set of character sequences that can match the term; for example, the restriction may require that a matching term be a number, a proper name, a noun phrase, or the restriction may specify other categorical, morphological, or syntactic criteria. *See* Specification at 25. Since a query as recited in the pending claims includes both fully specified terms and one or more at least partially unspecified terms, Smith fails to teach each and every element of the pending claims. The Examiner refers

to the use of wildcards in Smith to indicate that Smith suggests partially unspecified terms. *See* Office action, page 3. However, wildcards are typically characters whose purpose is to allow variations in length or spelling of a single, specified term within the query. As indicated in the Specification, a match for an unspecified term is not constrained by a requirement for the presence of particular letters, which is the constraint placed on a match by a wildcard; rather, a match for a partially unspecified term is constrained by the restriction or restrictions associated with the unspecified term. *See* Specification at 28.

At most, Smith suggests using attributes to restrict a search performed for a fully specified term modified by the attributes. For example, Smith indicates that attributes may limit a field of a document searched for a specified term. *See, e.g.*, Smith at col. 6, 10-20. However, Smith fails to teach or suggest partially unspecified query terms or specifying an attribute when no term is provided at all. As described in greater detail in both the specification and in previous responses to Office actions, a partially unspecified term need not include any search characters at all – for example, “Agatha Christie was born __ [Location]” is a query including the at least one partially unspecified term “__ [Location]”. In this example, no search strings are provided in the term at all; the term is partially unspecified because “[Location]” indicates that a matching set of characters should belong to a category of nouns identifying locations. Smith wholly lacks a suggestion of a query without a search string. Because the focus of Smith is on allowing users to provide more detail, not less, and on providing functionality for multi-dimensional searching with fine-grained, highly detailed search terms – not on allowing users to identify a type or attribute of a term without including the actual term – one of ordinary skill in the art would not be motivated to modify Smith to support searches on unspecified terms. Smith fails to teach or

suggest a query comprised of one or more fully specified terms **and** one or more at least partially unspecified terms. The Examiner relies upon Masand to cure the deficiencies of Smith.

However, Masand also fails to teach or suggest a query comprised of one or more fully specified terms **and** one or more at least partially unspecified terms. Masand describes a query text string including symbols representing a series of words, number or other *searchable* feature. *See* Masand at 2, lines 26-28; 4, lines 30-32. Masand utterly fails to disclose, teach or suggest a query that does not include a searchable feature. Masand states that a query may contain a query text string and ask for the identification of documents which contain the same text string or a query may ask for an identification of documents which contain any of the symbols of the query text, or documents which contain symbols within a selected proximity of other symbols. *See id.* Applicants respectfully submit that there is no suggestion in Masand that a query might be even partially unspecified or not include any search symbols or attributes at all. The focus of Masand is on generating tokens from queries and from searchable document text and comparing the text tokens with the query tokens to find a match – not on searching document text for unspecified terms. *See* Masand at 4, lines 27-47. In contrast, the pending claims recite a query including at least one partially unspecified term. In the example of a partially unspecified search term shown above, the system would not search for a string matching the symbols “ [Location]”. Rather, the system would search for a string whose symbols form a word categorized as a location. Therefore, no string is provided and the term is at least partially unspecified.

Applicants respectfully submit that Masand fails to disclose, teach or suggest a query comprised of one or more fully specified terms **and** one or more at least partially unspecified terms. Since Masand and Smith each fail to disclose, teach or suggest a query comprised of one or more fully specified terms **and** one or more at least partially unspecified terms, even if there

were motivation to combine the two, the combination of the references would still fail to teach or suggest the claimed invention.

Regarding claim 2, Applicants note that on page 3 of the present Office Action the Examiner states that Smith teaches identifying documents that contain the one or more at least partially unspecified terms, seemingly in contradiction with the Examiner's statement 10 lines earlier that Smith does not explicitly disclose one or more at least partially unspecified terms. Similarly, with regard to claims 27, 65, and 68, the Examiner seems to contradict the earlier statement regarding Smith by stating that Smith does teach at least partially unspecified terms. The arguments above regarding the failure of Smith to teach or suggest the limitation of receiving a query comprised of one or more fully specified terms and one or more at least partially unspecified terms, as required by independent claims 1 and 66, apply with equal force here and are reiterated here, with regards to claims 2, 27, 65, and 68, as if set forth in full.

Accordingly, Applicant respectfully submits that neither Smith nor Masand, either alone or in combination, teach or suggest each and every limitation of independent claims 1 and 66. Applicants respectfully request that the Examiner reconsider and withdraw the rejection of independent claims 1 and 66 and of dependent claims 2-3, 21, 25, 27, 34-36, 39, 64-65, and 67-68.

Claims 17-18 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Smith in view of Masand and further in view of Lee. The examiner uses Lee to teach that documents are accessible over the internet. It is noted that claims 17 and 18 ultimately depend from claim 1 and are allowable for the reasons discussed above. The arguments above regarding the failure of Smith and Masand to teach or suggest the limitation of receiving a query comprised of one or more fully specified terms and one or more at least partially unspecified terms, as required by

independent claims 1 and 66, apply with equal force here and are reiterated here, with regards to claims 17-18, as if set forth in full. Furthermore, Lee also fails to teach or suggest receiving a query comprised of one or more fully specified terms and one or more at least partially unspecified terms. Lee requires the receipt of a text string and only describes parsing the text string into words and identifying properties of the words for use in identifying matching words during a search process. *See* Lee at 1, paragraphs 0010-0011. As with Smith and Masand, Lee focuses on improving searches using fully specified queries and fails to teach or suggest receiving a query including one or more at least partially unspecified terms.

Claim 20 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Smith in view of Masand and further in view of Hobbs. It is noted that claim 20 depends from claim 1 and is allowable for the reasons discussed above. The arguments above regarding the failure of Smith and Masand to teach or suggest the limitation of receiving a query comprised of one or more fully specified terms and one or more at least partially unspecified terms, as required by independent claims 1 and 66, apply with equal force here and are reiterated here, with regards to claim 20, as if set forth in full. Furthermore, Hobbs also fails to teach or suggest receiving a query comprised of one or more fully specified terms and one or more at least partially unspecified terms. Hobbs describes a method for selecting multimedia information and linking the selected information to a phrase, work, sentence, or paragraph of text. The system for linking resources described by Hobbs focuses on the problem of linking terms in a document and using an intuitive graphical user interface to correlate networked resources with indexes of expert judgments linked to the networked resources.

CONCLUSION

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to pass this application to issue.

Please charge any additional fees that may be required, or credit any overpayments, to our Deposit Account No. 03-1721.

Respectfully submitted,
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